

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

DANIEL FILER

Plaintiff,

v.

MARK RUFF

Defendant.

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CIVIL ACTION NO.

NOTICE OF REMOVAL

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

COMES NOW Mark Ruff (“Defendant”), Defendant in the caused styled “*Daniel Filer v. Mark Ruff*” originally pending as Cause No. DC-24-06963 of Dallas County, Texas. Pursuant to the terms and provisions of 28 U.S.C. §§ 1331 and 1446, hereby file this Notice of Removal of the cause to the United States District Court for the Northern District of Texas.

I.

This Notice of Removal is filed on the basis of a federal question. Daniel Filer (“Plaintiff”) filed his Original Petition on May 10, 2024. The Petition cites Federal Statute in its cause of action of negligence as well as alleges Defendant “was not authorized by the Federal Aviation Administration to be a pilot.”

II.

This removal is timely because it is filed within 30 days after the receipt by Defendant, through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceedings is based. 28 U.S.C. § 1446(b). Accordingly, this removal is

timely because it is made within thirty days. Further, more than one year has not passed since the commencement of the action in a state court. 28 U.S.C. § 1446(b).

III.

The present suit is an action over which the United States District Court for the Northern District of Texas, Dallas Division, has jurisdiction because of the federal question presented in Plaintiff's Original Petition.

V.

Copies of all process, pleadings and orders, as well as the docket sheet relating to this case and previously filed with the 14th District Court of Dallas County, Texas are attached hereto as Exhibit 1.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Mark Ruff respectfully prays that this case be removed to the United States District Court for the Northern District of Texas.

Respectfully submitted,

JAMES S. BELL, P.C.

/s/ Connor Nash
James S. Bell
State Bar No.: 24049314
james@jamesbellpc.com
Connor Nash
State Bar No.: 24116809
connor@jamesbellpc.com
2808 Cole Avenue
Dallas, Texas 75204
(214) 668-9000

ATTORNEY FOR MARK RUFF

CERTIFICATE OF SERVICE

On August 12, 2024, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Connor Nash
Connor Nash